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To: Group Rcra-Docket@EPA

cc:

Subject: Attention Docket ID No. RCRA-2003-0006

We appreciate the opportunity to comment on the proposed Comprehensive Procurement Guideline (CPG) product designations and related Recovered Materials Advisory Notice and have several comments about the proposal.

It is important for the EPA to understand that we typically purchase compost and organic fertilizers as part of support services or performance type contracts, not as a single entity. In order to help us meet the CPG requirements for compost, we ask EPA to provide sample solicitation or contract language that can be inserted into these contracts. Similarly, to make it easier for our program managers to contract for services, please make this sample language and additional contract information available on a public accessible web page.

Prior to designating future CPG products, the EPA should establish training programs, solicitation and contract language, technical guidance, annual review and reporting procedures, and sample environmental management system provisions. The Department of Commerce is committed to implementing the buy recycled requirements but we require this additional assistance from EPA in order to meet the commitment.

If you have any questions or need further information about our comments, please contact our me.

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